

*gm*

RECEIVED  
JAN 14 2 35 PM '03

RECEIVED  
JAN 14 2 35 PM '03

JAN 14 2 35 PM '03

BY *[Signature]*

1 DANIEL G. BOGDEN  
United States Attorney  
2 KURT P. SCHULKE  
Chief, Criminal Division and  
3 ERIC JOHNSON  
Organized Crime Strike Force  
4 KATHLEEN BLISS  
Assistant U.S. Attorney  
5 333 Las Vegas Blvd. South  
Suite 5000  
6 Las Vegas, Nevada 89101  
Telephone: (702) 388-6336  
7 Fax: (702) 388-6418  
8 Attorneys for the Government

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

13	UNITED STATES OF AMERICA,	)	
		)	
14	Plaintiff,	)	
		)	
15	vs.	)	CR-S-02-554-JCM(RJJ)
		)	
16	BRUCE BARTON,	)	STIPULATION TO CONTINUE
		)	SENTENCING DATE AND
17	Defendant.	)	<u>PROPOSED ORDER</u>
		)	(First Request)

19 IT IS HEREBY STIPULATED AND AGREED by and between, Daniel  
20 G. Bogden, United States Attorney, District of Nevada, Kurt P.  
21 Schulke, Chief, Criminal Division, Eric Johnson, Chief, Organized  
22 Crime Strike Force, and Kathleen Bliss, Assistant United States  
23 Attorney, and Mace Yampolsky, Esq., local counsel for Defendant  
24 BRUCE BARTON, that the sentencing currently scheduled for January  
25 13, 2002, at 10:00 a.m., be vacated and continued for approximately  
26 ninety days.

1 This stipulation is entered into for the following  
2 reasons:

3 1. On October 23, 2002, Defendant BRUCE BARTON pled  
4 guilty and agreed to cooperate with the Government.

5 2. Defendant BARTON is currently working with Government  
6 agents in an ongoing investigation.

7 3. Counsel for Defendant BRUCE BARTON and Government  
8 counsel agree that additional time is needed to fully evaluate the  
9 extent of Defendant BARTON's cooperation.

10 4. The parties agree that the reasonable delay requested  
11 herein is necessary for the purpose of determining an important  
12 sentencing factor which is not presently capable of being resolved  
13 pursuant to Fed. R. Crim. P. 32(b)(4)(B).

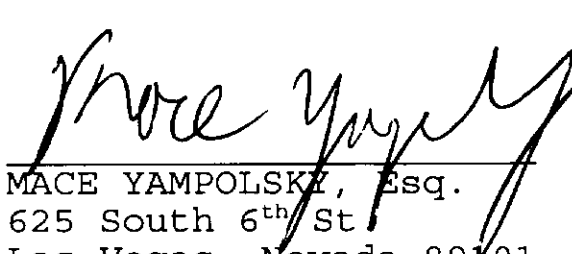
14 5. Consequently, the Government requests the sentencing  
15 in the instant case be postponed for approximately ninety days.

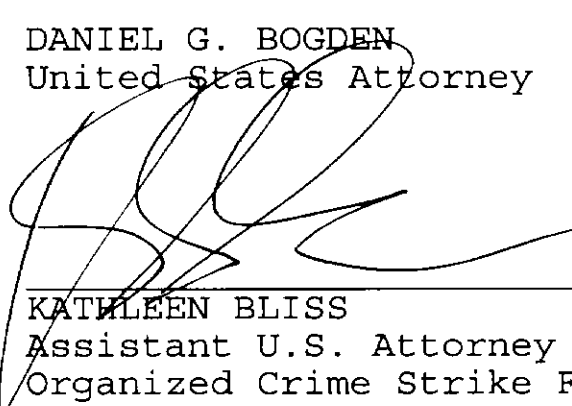
16 6. This is the first request for a continuance of  
17 Defendant BARTON's sentencing date.

18 DATED this 9th day of January, 2003.

19 Respectfully submitted,

20 DANIEL G. BOGDEN  
21 United States Attorney

22   
23 MACE YAMPOLSKY, Esq.  
24 625 South 6<sup>th</sup> St  
25 Las Vegas, Nevada 89101  
26 Local Counsel for Defendant  
BRUCE BARTON

27   
28 KATHLEEN BLISS  
29 Assistant U.S. Attorney  
30 Organized Crime Strike Force

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. ) CR-S-02-554-JCM(RJJ)  
 )  
BRUCE BARTON, ) O R D E R  
 )  
Defendant. )  
\_\_\_\_\_ )

Based upon the stipulation of the parties, Federal Rules of Criminal Procedure 32(b)(4)(B) and good cause appearing therefore,

IT IS HEREBY ORDERED that the sentencing currently scheduled for January 13, 2003, at 10:00 a.m. be vacated and continued to the 14th day of April, 2003, at the hour of 9:00AM

DATED this 13th day of January 2003

  
\_\_\_\_\_  
JAMES C. MAHAN  
United States District Judge